

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>BOND PHARMACY, INC., d/b/a AIS HEALTHCARE,</b>	)	
	)	
	)	
	)	
<b>Plaintiff-Counter Defendant,</b>	)	<b>Case No. 1:22-cv-01343-CMH-IDD</b>
	)	
<b>v.</b>	)	
	)	
<b>ANTHEM HEALTH PLANS OF VIRGINIA, INC., d/b/a ANTHEM BLUE CROSS AND BLUE SHIELD,</b>	)	
	)	
	)	
	)	
<b>Defendant- Counterclaimant.</b>	)	
	)	

**MEMORANDUM OF LAW IN SUPPORT  
OF JOINT MOTION TO STAY DEADLINES**

Plaintiff/ Counter-Defendant Bond Pharmacy, Inc., d/b/a AIS Healthcare (“AIS”), and Defendant/ Counterclaimant Anthem Health Plans of Virginia, Inc. d/b/a Anthem Blue Cross And Blue Shield (“Anthem,” collectively the “Parties”), submit this memorandum of law in support of the joint motion to stay all remaining deadlines.

The parties have reached a tentative settlement of all remaining claims and counterclaims in this litigation. As such, the parties request that all remaining deadlines in this matter be stayed while the parties finalize their tentative settlement.

There is good cause to stay the deadlines in this proceeding, including the current trial date of March 4, 2024, in light of the parties’ tentative settlement. Staying the current deadlines will enable the parties to focus their efforts on finalizing the tentative settlement without expending additional resources to continue preparing for trial. Judicial economy also weighs heavily in favor of a stay of the deadlines because the Court will not have to hear argument on AIS’s Motion to Permit Trial Testimony by Zoom, ECF No. 226, and Anthem’s Motion to Quash Subpoenas, ECF No. 230, which is scheduled for Friday, March 1, 2024, ECF No. 247. Nor will the Court have to rule on the many other pending motions filed by the parties. ECF Nos. 95 (AIS’s Motion to Exclude Malatesta), 108 (AIS’s Motion to Strike), 134 (Anthem’s Omnibus Motion in Limine), 140 (Anthem’s Motion to Exclude Dressel), 148 (Anthem’s Motion to Exclude Franklin), 195 (AIS’s Motion in Limine), 223 (AIS’s Motion in Limine). Accordingly, good cause exists for granting the parties’ joint motion.

Additionally, the parties have notified the Court and made this request well in advance of any remaining deadlines in this matter. L. Civ. R. 54(G).

### **CONCLUSION**

The Court should grant the parties’ joint motion and stay all remaining deadlines in this litigation while the parties finalize their tentative settlement.

Dated: February 23, 2024

Respectfully submitted,

By: /s/ Paul A. Werner

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**CERTIFICATE OF SERVICE**

I hereby certify that, on February 23, 2024, the foregoing document was sent by  
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